Air Quality Permitting
Response to Public Comments

October 28, 2016

Permit to Construct No. P-2015.0060
Project 61639

The Amalgamated Sugar Company LLC
Nampa, Idaho

Facility ID No. 027-00010

Prepared by:
Kelli Wetzel, Permit Writer
AIR QUALITY DIVISION

Final

Table of Contents

BACKGROUND

The Idaho Department of Environmental Quality (DEQ) provided for public comment on the proposed permit to construct for The Amalgamated Sugar Company LLC in Nampa from September 27 through October 27, 2016, in accordance with IDAPA 58.01.01.209.05.c. During this period, comments were submitted in response to DEQ's proposed action. Each comment and DEQ's response is provided in the following section.

PUBLIC COMMENTS AND RESPONSES

Public comments regarding the technical and regulatory analyses and the air quality aspects of the proposed permit are summarized below. Questions, comments, and/or suggestions received during the comment period that did not relate to the air quality aspects of the permit application, the Department's technical analysis, or the proposed permit are not addressed. For reference purposes, a copy of the Rules for the Control of Air Pollution in Idaho can be found at:

http://adminrules.idaho.gov/rules/current/58/0101.pdf.

Comment 1: This proposed modification appears to be motivated by a desire to reduce facility wide emissions. Table 2 in DEQ's Statement of Basis (SOB) lists the changes in emissions associated with the proposed boiler conversion. While the change in fuel source would reduce emissions of NOx, SO_2, and PM, DEQ acknowledges that the proposed action would also increase emissions of CO and VOC. In addition, Table 2 highlights that the proposed changes would increase CO_2 equivalent (CO_2e) emissions, however there is no mention or discussion of the increase in CO_2e emissions.

We find the increased emissions of CO_2e to be concerning and unclear. According to the U.S. Energy Information Administration1, coal emits anywhere from 205.7-228.6 pounds of CO_2 per million Btus of energy, whereas natural gas emits 117.0 pounds of CO_2 per million Btus of energy. Given these values, one would assume that a change in fuel source would correspond to decreased emissions of CO_2 and by association a decrease in CO_2e. Section 5.5 of TASCO's PTC application indicates that this will not be the case, and instead CO_2 emissions will increase and in turn drive the increase in CO_2e.

We are pleased to see TASCO's interest in reducing emissions from their facility. However, it appears the proposed actions may contribute more greenhouse gases than previous operations. Based on TASCO's permit application, baseline CO_2 emissions from Boilers 1 & 2 were 108,648 T/yr. TASCO's projected CO_2 emissions of 134,291 T/yr are based on an annual usage of 1,839,600 klbs steam – gas. We propose TASCO curtail operations to an annual usage of 1,488,329 klbs steam-gas. Utilizing this value will ensure that CO_2 emissions do not increase, thereby increasing CO_2e emissions, while simultaneously retaining the lowered emissions of NOx, SO_2, and PM. We believe this proposal would provide the best net environmental benefit.

Response 1: The facility has proposed a modification to utilize only natural gas in the No. 1 and No.2 B&W Boilers and to eliminate coal as a fuel source. The emission changes for this project, referred to as the boiler conversion project, are presented in Table 2 of the Statement of Basis. The project was proposed for an existing major stationary source as defined in 40 CFR 52.21(b) and therefore a PSD (Prevention of Significant Deterioration) applicability analysis was used to address any emission increases.

In a June 23, 2014 Supreme Court Decision, EPA can limit a facility's CO_2e emissions only if they are a major source for another criteria pollutant and not solely CO_2e. In accordance with §52.21(a)(2)(iv)(*c*), the actual-to-projected actual test was used for the project because it involves existing emissions units. The sum of the difference between projected actual emissions

(as defined in §52.21(b)(41) and baseline actual emissions (as defined in §52.21(b)(48) for this permitting action did not equal or exceed pollutant significance thresholds as defined in §52.21(b)(23).

The facility elected to use actual production data from the 24-month period that includes the 2006-2007 beet processing campaign for the purposes of determining baseline actual emissions of all regulated NSR pollutants. During this baseline year, coal was the primary boiler fuel source accounting for over 94% of fuel usage. These baseline emissions were then compared to the projected actual emissions which in the case is the facility's potential to emit. The increase in CO_2e emissions also reflects an increased utilization of the boilers in the projected actual emissions. The increase in CO_2e emissions is below the PSD significance threshold of 75,000 tons per year and therefore no usage limits will be placed on the facility's boiler operations.

Comment 2: Add a missing project from 2012 in the Statement of Basis - A seventh white sugar centrifugal was installed as a spare to replace the production of the other six centrifugals as they are individually removed from service for repairs or maintenance. All seven white centrifugals can be operated as needed.

Response 2: The requested change has been made.

Comment 3: Propose adding the following language under the Emissions Evaluation section of the Statement of Basis – "The following comparisons were provided: 1) Emissions from the B&W boilers firing coal and natural gas (project emissions); 2) Facility wide baseline emissions for 2006/2007 vs. projected emissions; and 3) Facility wide baseline emissions for 1979/1980 vs. projected emissions. Summaries of these emission inventories are provided below and in Appendix A.

Response 3: The requested change has been made.

Comment 4: Propose changing the title of the section to "Historical Lookback Facility-Wide Emissions Evaluation (1979-80 vs. Projected Actual)" in place of "Historical Lookback Facility-Wide Emission Increase (1979-80 vs. Projected Actual)" on page 12 of the Statement of Basis.

Response 4: The requested change has been made.

Comment 5: Propose deletion of the paragraph on page 12 of the Statement of Basis – "Although not addressing surplus/excess emissions that occurred *during* the relevant lookback timeframe (1979 through 2007), by incorporating federally-enforceable emission limits in the permit pursuant to PSD program requirements, emissions at the beginning and at the end of the relevant timeframe are made comparable. A summary of these emission limits is provided in Table 4; refer to the Permit Conditions Review section for further discussion of these limits."

Response 5: The paragraph will remain in the Statement of Basis as it provides an explanation of the historical lookback comparison and the emission limits relevant to the PSD program.

Comment 6: Propose changing the title of Table 4 to "Federally-Enforceable Permit Conditions For the Project" on page 13 of the Statement of Basis.

Response 6: The title of Table 4 in the Statement of Basis will remain the same as it accurately reflects the intent of the table.

Comment 7: Propose changing the first sentence under the Permit to Construct section on page 12 of the Statement of Basis to "The permittee has requested that a PTC be issued to the facility for the modified emission sources project to fire natural gas only in the No. 1 and No. 2 B&W boilers".

Response 7: The requested change has been made.

Appendix

Public Comments Submitted for

Permit to Construct

P-2015.0060

IDAHO CONSERVATION LEAGUE

208.345.6933 • PO Box 844 Boise ID 83702 • www.idahoconservation.org

10/26/2016

Anne Drier
Air Quality Division
DEQ State Office
1410 N. Hilton
Boise, ID 83706

Kelli Wetzel
Air Quality Division
DEQ State Office
1410 N. Hilton
Boise, ID 83706

Submitted via email: anne.drier@deq.idaho.gov and kelli.wetzel@deq.idaho.gov

RE: Proposed Permit to Construct No. P-2015.0060 for The Amalgamated Sugar Company

Dear Ms. Drier and Ms. Wetzel;

Thank you for the opportunity to comment on the proposed air quality permit to construct for The Amalgamated Sugar Company's (TASCO) facility in Nampa, ID. Since 1973, the Idaho Conservation League has been Idaho's leading voice for clean water, clean air and wilderness—values that are the foundation for Idaho's extraordinary quality of life. The Idaho Conservation League works to protect these values through public education, outreach, advocacy and policy development. As Idaho's largest state-based conservation organization, we represent over 25,000 supporters, many of whom have a deep personal interest in protecting Idaho's air quality.

This proposed modification appears to be motivated by a desire to reduce facility wide emissions. Table 2 in DEQ's Statement of Basis (SOB) lists the changes in emissions associated with the proposed boiler conversion. While the change in fuel source would reduce emissions of NOx, SO_2, and PM, DEQ acknowledges that the proposed action would also increase emissions of CO and VOC. In addition, Table 2 highlights that the proposed changes would increase CO_2 equivalent (CO_2e) emissions, however there is no mention or discussion of the increase in CO_2e emissions.

We find the increased emissions of CO_2e to be concerning and unclear. According to the U.S. Energy Information Administration[1], coal emits anywhere from 205.7-228.6 pounds of CO_2 per million Btus of energy, whereas natural gas emits 117.0 pounds of CO_2 per million Btus of energy. Given these values, one would assume that a change in fuel source would correspond to decreased emissions of CO_2 and by association a decrease in CO_2e. Section 5.5 of TASCO's PTC application indicates that this will not be the case,

[1] Emission estimates obtained from: https://www.eia.gov/tools/faqs/faq.cfm?id=73&t=11

and instead CO_2 emissions will increase and in turn drive the increase in CO_2e.

We are pleased to see TASCO's interest in reducing emissions from their facility. However, it appears the proposed actions may contribute more greenhouse gases than previous operations. Based on TASCO's permit application, baseline CO_2 emissions from Boilers 1 & 2 were 108,648 T/yr. TASCO's projected CO_2 emissions of 134,291 T/yr are based on an annual usage of 1,839,600 klbs steam – gas. We propose TASCO curtail operations to an annual usage of 1,488,329 klbs steam-gas. Utilizing this value will ensure that CO_2 emissions do not increase, thereby increasing CO_2e emissions, while simultaneously retaining the lowered emissions of NO_x, SO_2, and PM. We believe this proposal would provide the best net environmental benefit.

Please do not hesitate to contact me at 208-345-6933 ext. 23 or ahopkins@idahoconservation.org if you have any questions regarding our comments or if we can provide you with any additional information on this matter.

Sincerely,

Austin Hopkins
Conservation Assistant

2008	In order to improve the performance of the molasses separator, the separator was converted to a coupled loop operating mode. Based on a steam balance assessment for this reconfiguration, energy usage was projected to remain the same or decrease for this operating mode.
2012	A seventh white sugar centrifugal was installed as a spare to replace the production of the other six centrifugals as they are individually removed from service for repairs or maintenance. All seven white centrifugals can be operated as needed.
2010-2012	Separator and sugar end efficiency improvements were completed over a two year period beginning in 2010. These projects were designed so that steam consumption rates and air emissions would not increase during all modes of operation. A PTC exemption evaluation was previously submitted and discussed with IDEQ for these projects.
2005, 2008, 2012	Automated packaging (2005), powdered sugar packaging (2008), retail packaging (2012).
2013-2015	Byproduct tanks were installed for storage of concentrated separator byproduct (CSB) which is principally sold as an animal feed byproduct. The primary purpose of these tanks was to provide long-term storage of the animal feed byproduct for sales throughout the year. In 2015, two tanks were replaced with one tank to maximize sales.
2003-2015	To ensure energy efficient facility operations, evaporator heat exchangers (calandrias) have been routinely replaced or upgraded. These projects include: 1) Replace calandria in Evaporator 4A-2 (2003); 2) Replace calandria in Evaporator 4B (2004); 3) Replace calandria in Evaporator 5A (2006); 4) Evaporator 5B upgrade; 5) Replace calandria in #3 White Pan (2014) and 6) Replace calandria in #2 White Pan (2015). Heat exchanger replacements or upgrades allow for more efficient use of boiler steam.
2012, 2013, 2015	Process heater energy efficiency projects from 2012 thru 2015 were as follows: 1) Replacement of A-side Press Water Heater (2012); Replacement of A-side Circulation Juice Heater (2013) and; 3) Replacement of B-side Circulation Juice Heater (2015).
2010, 2013, 2014, 2015	This project consisted of five phases to replace and modernize the boiler control systems. Previous combustion and burner management systems were replaced with new equipment. Improved controls are expected to improve combustion and energy efficiencies.

The historic equipment review initiated by DEQ in 2002 is resolved by issuance of this PTC. Tier I Operating Permit T1-050020, issued on December 12, 2002 and modified on May 23, 2006 included a compliance schedule to address permitting issues raised by equipment that was installed historically at TASCO-Nampa. TASCO satisfied the compliance schedule and no further information, review, or enforcement is required by DEQ to resolve the historic equipment changes. The proposed boiler emission reductions accomplished by this PTC address DEQ's conclusions with respect to increased utilization of the boilers resulting from historic equipment changes. The conditions of this PTC, therefore, fulfill the compliance schedule and DEQ's historic equipment review. The Tier I operating permit renewal can be issued without Section 14 (compliance schedule).

Boiler Conversion Project Chronology

December 21, 2015	DEQ received an application and an application fee.
January 20, 2016	DEQ determined that the application was incomplete.

Source Description	Control Equipment	Installation Date
Fuel: anthracite coal or coke	40% one shared baghouse (AK1/2)	
Lime Kiln Building (S-K3)	Baghouse (A-K3)	Unknown
A&B Process Slakers (S-K4) Operational Capacity: 257 T/day CaO	Wet Scrubber (A-K4)	1942-1968
Drying Granulator (S-W1) Manufacturer: TASCO Operational capacity: 46 T/hr sugar	Wet Scrubber (A-W1)	1987
Cooling Granulator No. 1 (S–W2) Manufacturer: Hersey Operational capacity: 27.5 T/hr sugar	Baghouse (A–W2) (installed 1981)	1944
Cooling Granulator No. 2 (S–W3) Manufacturer/Model: Great Western Sugar Operational capacity: 27.5 T/hr sugar	Baghouse (A–W3)	1981
Process No. 2 Sugar Handling (S–W4)	Baghouse (A–W4)	1965
Sugar Remelt Handling (S-W5)		Not in service
Specialties Handling (S-W6)	Baghouse (A-W6)	1965
Packaging Line Handling (S–W7)	Baghouse (A–W7)	1982

Emissions Evaluation

Emission inventories provided in the application included emissions of state-regulated toxic air pollutants (TAP), and federally-regulated criteria pollutants, hazardous air pollutants (HAP), and greenhouse gases (GHG).). The following comparisons were provided: 1) Emissions from the B&W boilers firing coal and natural gas (project emissions); 2) Facility wide baseline emissions for 2006/2007 vs. projected emissions; and 3) Facility wide baseline emissions for 1979/1980 vs. projected emissions. Summaries of these emission inventories are provided below and in Appendix A.

~~Summaries of these emission inventories are provided below and in Appendix A.~~

NSR Applicability for Boiler Conversion Project

As summarized in Table 2, upon completion of the boiler conversion project to permanently disable the coal feed system for the B&W boilers, no apparent increase in federally-regulated air pollutants is expected, with the exception of volatile organic compounds (VOC) and carbon monoxide (CO). The emission increase of VOC and CO is not expected to exceed the significance threshold; therefore, the boiler conversion project would not be applicable to PSD program requirements. The permittee has elected to use 2006-2007 for the baseline years (Table 3); coal was the primary boiler fuel source over this timeframe, accounting for 94% of overall fuel usage. In addition, baseline emissions were based on the operation of three coal-fired pulp dryers. Refer to the PSD Classification (40 CFR 52.21) section for additional information. The permittee has also reported estimated PAE is equivalent to the potential emissions (PTE) for the facility.

Table 2 BOILER CONVERSION PROJECT EMISSION CHANGES – NSR APPLICABILITY

Description	CO [b] T/yr	NO_x [b] T/yr	SO_2 [b] T/yr	PM [a][b] T/yr	VOC [b] T/yr	CO_2e [c] T/yr
Baseline Actual Emissions [d]	2241.0	1963.0	2374.4	171.1	73.1	418,807
Projected Actual Emissions [d]	2257.7	974.9	1616.6	115.6	77.3	463,372
Emission Increases [e]	16.7	-988.1	-757.8	-55.5	4.2	44,565
Significance Thresholds [e]	*100*	*40*	*40*	*15*	*40*	*75,000*

a) PM, PM_{10}, and $PM_{2.5}$ emissions were estimated to be equivalent; significance threshold listed is for $PM_{2.5}$, the most stringent threshold when applying assumption.
b) Regulated NSR Pollutant as defined in 40 CFR 52.21(b)(50).
c) Tons of CO_2 equivalent emissions as defined in 40 CFR 52.21(b)(49).
d) Baseline and Projected Actual Emissions estimates include all emissions units at the facility ("facility-wide"). Baseline actual emissions used were average of actual emissions during the campaign years 2006-2007.
e) Net emission increase and significant net emission increase thresholds as determined in accordance with 40 CFR 52.21(b)(40), 40 CFR 52.21(b)(23), and 40 CFR 52.21(b)(3)(i).

The boiler conversion project is therefore not expected to result in a PSD significant net emission increase. Baseline Actual Emissions (BAE) and Projected Actual Emissions (PAE) were determined using New Source Review (NSR) Prevention of Significant Deterioration (PSD) procedures and definitions set forth in 40 CFR 52.21(a)(2)(iv)(c) and 40 CFR 52.21(b).

Toxic Air Pollutant Emissions Changes for the Boiler Conversion Project

Upon completion of the boiler conversion project, no apparent increase in state-regulated toxic air pollutants (TAP) is expected. The applicant has demonstrated preconstruction compliance with TAP standards in accordance with IDAPA 58.01.01.210.

Historical Lookback Facility-Wide Emissions ~~Increases~~ Evaluation (1979-~~1980~~1986 vs. Projected Actual)

A comparison of historical and projected facility-wide emissions was undertaken in an effort to redress historical modifications (including PSD modifications) that occurred at the TASCO-Nampa facility within the timeframe from 1979-80 until approximately 2007. Refer to the Project Chronology section for a summary of these historical modifications.

Up to six unpermitted equipment changes at the TASCO-Nampa facility within this timeframe resulted in both a change in the method of operation of emissions units, and in probable net emissions increases. Collectively, these equipment changes:

- included the addition of juice storage tanks, drying and cooling granulators, generators, and replacement of diffusors
- resulted in corresponding net emission increases, with at least one (or more) such emission increases exceeding the PSD NSR regulated pollutant applicability thresholds
- would have been subject to requirements and review under the PSD program

As provided in Table 3, when comparing 1979-1980 baseline emissions to the projected-actual emissions following the facility's commitment to fire natural gas only in the No.1 and No.2 B&W boilers, overall facility-wide emissions are expected to return to pre-1979 emissions levels, with the exception of VOC and CO emissions.

Table 3 HISTORICAL LOOKBACK FACILITY-WIDE EMISSIONS COMPARISON

Description	CO [a] T/yr	NO_x [a] T/yr	SO_2 [a] T/yr	PM/PM_{10} [a] T/yr	VOC [a] T/yr
1979-1980 Baseline Actual Emissions [b]	1913.8	1606.9	1638.1	159.4	50.1
Projected Actual Emissions [c]	2257.7	974.9	1616.6	115.6	77.3
Emission Changes [d]	343.9	-632	-21.5	-43.8	27.2
Significance Thresholds [e]	*100*	*40*	*40*	*15*	*40*

a) Regulated NSR Pollutant as defined in 40 CFR 52.21(b)(50).
b) Average of actual emissions over 1979-1980 for purposes of the historical lookback review, with steam from coal combustion 89.7% by weight.
c) Projected actual emissions estimates include all emissions units at the facility ("facility-wide"), with steam from natural gas combustion 100% by weight.
d) ~~Cumulative net change in a~~Emissions comparing projected actual emissions to 1979-1980 baseline emissions.
e) Net emission increase and significant net emission increase thresholds as determined in accordance with 40 CFR 52.21(b)(40), 40 CFR 52.21(b)(23), and 40 CFR 52.21(b)(3)(i), except as noted to address the historical lookback timeframe.

~~Although possible not addressing surplus/excess emissions that occurred *during* the relevant lookback timeframe (1979 through 2007) are not addressed, by incorporating federally- enforceable emission limits in the permit pursuant to PSD program requirements, emissions at the beginning and at the end of the relevant timeframe are made comparable. A summary of these emission limits is provided in Table 5; refer to the Permit Conditions Review section for further discussion of these limits.~~

Projected CO emissions as provided in Table 4 are well below annual emissions limits in the Tier I (No. T1-

Table 4 FEDERALLY-ENFORCEABLE PERMIT CONDITIONS ~~REQUIRED PURSUANT TO 40 CFR 52.21~~ FOR THE PROJECT

Permit(s)	Condition(s)	Limit Description
P-2015.0060 PROJ 61639	2.1	Conversion of B&W boilers to natural gas firing only
P-2015.0060 PROJ 61639	2.5	No benefit of emission decreases in NSR applicability or netting (upon completion of boiler conversion to gas firing under condition 2.1)

REGULATORY ANALYSIS

Attainment Designation (40 CFR 81.313)

The facility is located in Canyon County, which is designated as attainment or unclassifiable for $PM_{2.5}$, PM_{10}, SO_2, NO_2, CO, and Ozone. Refer to 40 CFR 81.313 for additional information.

Facility Classification

The AIRS/AFS facility classification codes are as follows:

For THAPs (Total Hazardous Air Pollutants) Only:

A = Use when any one HAP has actual or potential emissions ≥ 10 T/yr or if the aggregate of all HAPS (Total HAPs) has actual or potential emissions ≥ 25 T/yr.

SM80 = Use if a synthetic minor (potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable limitations) and the permit sets limits ≥ 8 T/yr of a single HAP or ≥ 20 T/yr of THAP.

SM = Use if a synthetic minor (potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable limitations) and the potential HAP emissions are limited to < 8 T/yr of a single HAP and/or < 20 T/yr of THAP.

B = Use when the potential to emit without permit restrictions is below the 10 and 25 T/yr major source threshold

UNK = Class is unknown

For All Other Pollutants:

A = Actual or potential emissions of a pollutant are ≥ 100 T/yr.

SM80 = Use if a synthetic minor for the applicable pollutant (potential emissions fall below 100 T/yr if and only if the source complies with federally enforceable limitations) and potential emissions of the pollutant are ≥ 80 T/yr.

SM = Use if a synthetic minor for the applicable pollutant (potential emissions fall below 100 T/yr if and only if the source complies with federally enforceable limitations) and potential emissions of the pollutant are < 80 T/yr.

B = Actual and potential emissions are < 100 T/yr without permit restrictions.

UNK = Class is unknown.

Table 5 REGULATED AIR POLLUTANT FACILITY CLASSIFICATION

Pollutant	Permitted PTE (T/yr)	Major Source Thresholds (T/yr)	AIRS/AFS Classification

PM	115.6	100	A
$PM_{10}/PM_{2.5}$	113.0	100	A
SO_2	1616.6	100	A
NO_x	974.9	100	A
CO	2257.7	100	A
VOC	77.3	100	B
HAP (single)	46.6	10	A
HAP (Total)	55.0	25	A

Permit to Construct (IDAPA 58.01.01.201)

IDAPA 58.01.01.201.....Permit to Construct Required

The permittee has requested that a PTC be issued to the facility for the modified emission sources project to fire natural gas only in the No. 1 and No. 2 B&W boilers. Therefore, a permit to construct is required to be issued in accordance with IDAPA 58.01.01.220. This permitting action was processed in accordance with the procedures of IDAPA 58.01.01.200-228. This PTC was processed in accordance with IDAPA 58.01.01.209.05.c, and the applicable requirements contained in this PTC will be incorporated into the Tier I operating permit as an administrative amendment.

Tier II Operating Permit (IDAPA 58.01.01.401)

IDAPA 58.01.01.401.....Tier II Operating Permit

The application was submitted for a permit to construct (refer to the Permit to Construct section), and an optional Tier II operating permit has not been requested[1]. Therefore, the procedures of IDAPA 58.01.01.400–410 were not applicable to this permitting action.

Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70)

IDAPA 58.01.01.301.....Requirement to Obtain Tier I Operating Permit

TASCO – Nampa is classified as a major facility as defined in IDAPA 58.01.01.008.10:

- The facility emits or has the potential to emit a regulated air pollutant in an amount greater than or equal to 100 T/yr (and greater than or equal to 250 T/yr);
- The facility emits or has the potential to emit a single regulated HAP in excess of 10 T/yr;
- The facility emits or has the potential to emit a combination of regulated HAP in excess of 25 T/yr.

TASCO-Nampa has a fossil-fuel boiler (or combination thereof) of more than 250 MMBtu/hr heat input; therefore the boiler house (which includes the No. 1 and No. 2 B&W Boilers, Riley Boiler, and Union Boiler) was classified as a designated facility as defined in IDAPA 58.01.01.006.30 and 40 CFR 52.21(b)(1)(i)(a), and fugitive emissions were included when determining the major facility classification in accordance with IDAPA 58.01.01.008.10.c.i, and when determining project net emissions increases in accordance with IDAPA 58.01.01.007 and 40 CFR 52.21(b)(48)(ii).

This PTC was processed in accordance with IDAPA 58.01.01.209.05.c, and the applicable requirements contained in this PTC will be incorporated in the Tier I operating permit.

Refer to Appendix A for a summary of the regulated air pollutant emission estimates provided in the application.

---

1 As discussed in the permit application, IDEQ previously issued facility wide Tier II operating permits in support of the Ada County PM_{10} Maintenance Plan and a Tier II permit for the Riley boiler BART determination that addressed emissions from the boilers when combusting coal. Compliance with this proposed PTC will demonstrate compliance with those existing Tier II permits.